

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Luann Gould,	:	
	:	
Plaintiff,	:	05 CV 11118 (PBS)
	:	
— v. —	:	
	:	PLAINTIFF’S MOTION TO
Lucent Technologies, Inc.,	:	EXTEND TIME TO FILE SUMMARY
	:	JUDGMENT OPPOSITION PAPERS
	:	BY 14 DAYS
Defendant.	:	
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The Plaintiff respectfully requests the Court to extend Plaintiffs’ time to file its Opposition to Summary Judgment from September 5, 2006 to September 19, 2006.

As grounds for this extension of time, the Plaintiff is requesting additional time to complete its opposition papers and have affidavits signed and returned. Earlier in August, the Plaintiff agreed to Defendant’s request to file Summary Judgment papers later than expected under the then-current scheduling order. This affected the Plaintiff’s response period, falling during the last two weeks of August, which in this case, included scheduled vacation time for Plaintiff’s attorneys.

This request for extension of time was discussed with opposing counsel and agreed upon.

Respectfully Submitted,

HARVEY & KLEGER

By: /s/ Robert R. Thomas

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Dated: September 4, 2006